



Infrastructure · Water · Environment · Buildings

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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
King Highway Landfill Operable Unit 3 Progress Report (March 2012)

ENVIRONMENT

Dear Keith:

Date:
April 4, 2012

Attached is the March 2012 Monthly Progress Report for the King Highway Landfill Operable Unit 3 (KHL OU) of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site) as per Section XVI of the Administrative Order by Consent for the Remedial Design/Remedial Action at the KHL OU, as was fully executed on February 8, 2000 (AOC). Please note, however, pursuant to Section XVI of the AOC, after a Certificate of Completion of Construction is issued by the Michigan Department of Environmental Quality (MDEQ), as provided in Section XXVII (Certificate of Completion of Construction) of the AOC, progress reports shall be submitted pursuant to the schedules set forth in the plans identified in the Statement of Work.

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Our ref:
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If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

Patrick McGuire
Principal Environmental Engineer

Attachment

Copies:

Garry Griffith, P.E., Georgia-Pacific LLC
Daria Devantier, Michigan Department of Environmental Quality
Michael Berkoff, USEPA Region 5
Dawn Penniman, P.E., ARCADIS

**MONTHLY PROGRESS REPORT FOR THE KING HIGHWAY LANDFILL OPERABLE UNIT 3 OF THE
ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE**

MARCH 2012

PREPARED APRIL 4, 2012

ON BEHALF OF GEORGIA-PACIFIC LLC

SUBMITTED TO

**KEITH KRAWCZYK, PROJECT COORDINATOR
REMEDATION AND REDEVELOPMENT DIVISION**

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

**MONTHLY PROGRESS REPORT FOR THE KING HIGHWAY LANDFILL OPERABLE UNIT 3 OF THE
ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE**

MARCH 2012

Remedial Activities

- On March 1, ARCADIS submitted to MDEQ the February 2012 Monthly Progress Report.
- On March 8, representatives of MDEQ, the Michigan Department of Attorney General, the U.S. Environmental Protection Agency (USEPA), and Georgia-Pacific LLC (Georgia-Pacific) participated in a conference call to discuss the following items related to the KHL OU:
 - The development of a proposed sampling plan for the pore water outfalls on the north and south side of the KHL to identify the cause of the orange-rust colored appearance of the water at the outfalls.
 - The development of a proposed gas probing and soil sampling plan for the area of dead vegetation south of the berm on the north side of the KHL to evaluate whether landfill gas was permeating through the liner system and causing the dead vegetation.
 - The development and submittal of a financial assurance mechanism, which includes the development of a cost estimate for implementing the Operation and Maintenance Plan for a period of 30 years and documentation of operation and maintenance costs for the past five years.
- On March 9, MDEQ provided Georgia-Pacific with the Consent Easement Holder guidance and form and an example of a recreational use exemption for use with the Restrictive Covenant for the Mill Lagoon portion of the KHL OU.
- On March 16, on behalf of Georgia-Pacific, ARCADIS provided to MDEQ and USEPA the *Time Critical Removal Action Final Report for the Refuse Area at the Georgia-Pacific Corporation Kalamazoo Mill Property and the Oxbow Area at the Former Hawthorne Mill Property* (TCRA; 2008); the USEPA Letter of Approval of the TCRA (2008); and *Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site – Response Activities Summary Former Georgia-Pacific Mill Lagoons* (2000) in support of the construction of the Kalamazoo River Trail on the Mill Lagoon property.
- On March 20, on behalf of Georgia-Pacific, ARCADIS submitted to MDEQ and USEPA a proposed plan for sampling the pore water outfalls at the KHL OU. The plan includes the collection of water samples from the outfalls and analyzing the samples for total and dissolved iron, along with measuring turbidity, pH, redox, and dissolved oxygen analysis in the field.

Operation, Maintenance and Monitoring Activities

- On March 9, on behalf of Georgia-Pacific, ARCADIS submitted the 2012 1st quarter landfill gas monitoring report to MDEQ and USEPA.

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MARCH 2012

Upcoming Activities

- Replacement of the valves on gas probes GW-9 through GW-11 will be completed prior to the next monitoring event scheduled for May 2012.
- In April, ARCADIS will coordinate with MDEQ to schedule the 2012 2nd quarter landfill gas monitoring event and annual groundwater monitoring event for May 2012.
- After MDEQ approval of the proposed sampling plan for the pore water outfalls, ARCADIS will monitor weather conditions to schedule sampling of the pore water outfalls.
- In April, Georgia-Pacific will submit to MDEQ and USEPA the cost estimate for implementing the Operation and Maintenance Plan (as drafted and submitted for agency approval on January 19, 2012, for a period of 30 years and documentation of operation and maintenance costs for the past five years, and the financial assurance mechanism for implementation of operation and maintenance activities.
- In April, Georgia-Pacific will submit to MDEQ and USEPA the proposed gas probing and soil sampling plan for the area of dead vegetation on the north side of the KHL.
- ARCADIS will perform a review of MDEQ's cost recovery package for the KHL OU.
- Georgia-Pacific awaits MDEQ's comments on the revised DRAFT FINAL *Operation and Maintenance Plan* (Deliverable 12) and the revised DRAFT FINAL *Final Report for Completion of Construction* (Deliverable 14), which were submitted to MDEQ on January 19 and 20, 2012, respectively.